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February 10, 2025

Via ECF

Honorable Cathy L. Waldor, U.S.M.J.
Martin Luther King Jr. Courthouse
50 Walnut Street
Room 4040, Courtroom 4C
Newark, NJ 07101

Re: *Doe v. Shao et al.*
Civil Action No. 2:24-cv-09972-BRM-CLW

Dear Judge Waldor:

Please accept this letter requesting denial of Defendant Wang's application for an extension of time to respond to Plaintiff's Complaint, which was filed on October 21, 2024. As indicated in Mr. Johnson's letter, Defendant Wang wishes to wait to respond until after this Court's decides the pseudonym motion. Respectfully, while both parties have requested scheduling accommodations in the past, delaying this case for an indeterminate amount of time as we await a decision prejudices Plaintiff due to the involvement of digital evidence, which is notoriously fleeting. It is an unfortunate reality that internet service providers and internet companies such as Google have exceptionally short data retention windows which may pass if this case does not continue forward.

Defendant Wang's stated reason for requesting the extension is that the ruling will impact her responsive pleadings, however, given Defendant Wang is keenly aware of Plaintiff's identity, the only thing this Court's decision will change is whether she can include Plaintiff's name and other invasive information about him in her papers. Such improper purpose is insufficient to overcome the prejudice Plaintiff is likely to face if such an extension is granted. Accordingly, Defendant Wang's request should be denied.

Finally, it should be noted that Defendant Shao has not made a request for an extension and should be required to file responsive pleadings as scheduled, on February 13, 2025.

Very Truly Yours,

DANIEL SZALKIEWICZ & ASSOCIATES, P.C.

/s/ Daniel Szalkiewicz

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